

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Small Business Financial Solutions, LLC

4500 East West Hwy, 6th Floor

Bethesda, MD 20814

Plaintiff,

v.

: Civil Action No:

Corporate Client Services, LLC

1880 North Congress Ave, Suite 211

Boynton Beach, FL 33426

Defendant(s).

AFFIDAVIT OF PATRICK SIEGFRIED

1. I, Patrick Siegfried, am over the age of eighteen (18) years old and competent to testify to the matters stated herein and am duly authorized to make this affidavit.
2. I solemnly affirm under the penalty of perjury and upon personal knowledge that the contents of the facts herein are true and correct.
3. I, Patrick Siegfried, am Deputy General Counsel of Plaintiff, Small Business Financial Solutions, LLC.
4. Plaintiff's Representatives have been contacted by Defendant numerous times over the few past years.
5. Defendant is aware that Plaintiff is a Maryland business and that our operations are performed in Maryland.
6. Defendant is aware that payments to be made to Plaintiff by the customer are mailed to, and received, processed, and posted in Maryland. Additionally, any ACH payments are initiated and performed in Maryland.
7. Defendant is also aware that Plaintiff files lawsuits in Maryland, and Defendant hires

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5. Defendant is aware that Plaintiff is a Maryland business and that our operations are performed in Maryland.

6. Defendant is aware that payments to be made to Plaintiff by the customer are mailed to, and received, processed, and posted in Maryland. Additionally, any ACH payments are initiated and performed in Maryland.

7. Defendant is also aware that Plaintiff files lawsuits in Maryland, and Defendant hires

local Maryland counsel to represent Plaintiff's customers that have enrolled in Defendant's debt relief program.

8. During the course of litigation, and sometimes prior to litigation, Defendant and/or Defendant's counsel, communicate substantially with Plaintiff's representatives and Plaintiff's counsel regarding the customers' accounts, possible settlements, and litigation.

9. Often times local Maryland counsel hired by Defendant to represent the customer fails to represent the debtor and fails to engage in litigation. The below cases ended in Judgment against the debtors due to CCS's hired attorney's actions being so egregious that the Maryland Court had no other option than to issue sanctions.

A. The debtors stopped making payments after June 10, 2019, and upon filing suit in Circuit Court for Montgomery County, Maryland, Small Business Financial Solutions, LLC became aware that CCS was involved with the debtors, and after the attorney hired by CCS to represent the Debtor failed to engage in litigation, sanctions were entered in the form of a Judgment against the debtors Rebecca Russell and Joel Russell on June 30, 2020. *See Small Business Financial Solutions, LLC v. Truemetrics, et al.*, Case No. 469837V. The debtors have not made any payments since June 10, 2019 and currently owe Small Business Financial Solutions, LLC \$52,068.42.

B. The debtors stopped making payments after June 24, 2019, and upon filing suit in Circuit Court for Montgomery County, Maryland, Small Business Financial Solutions, LLC became aware that CCS was involved with the debtors, and after the attorney hired by CCS to represent the Debtor failed to engage in litigation, sanctions were entered in the form of a Judgment against the debtors Lucas David Design, Inc. and David Britez on July 8, 2020. *See Small Business Financial Solutions, LLC v. Lucas David Design, et al.*,

Case No. 470412V. The debtors did not make any payments from June 24, 2019 to August 27, 2020 and owed Small Business Financial Solutions, LLC \$70,144.19. The parties have since been able to negotiate a settlement, but Defendant's actions resulted in a Judgment against the debtors and prevented Small Business Financial Solutions, LLC from receiving its payments for approximately one year.

- C. The debtors stopped making payments after September 12, 2019, and upon filing suit in Circuit Court for Montgomery County, Maryland, Small Business Financial Solutions, LLC became aware that CCS was involved with the debtors, and after the attorney hired by CCS to represent the Debtor failed to engage in litigation, sanctions were entered in the form of a Judgment against the debtors MCE Investments, LLC and Melvin Ellis on September 15, 2020. *See Small Business Financial Solutions, LLC v. MCE Investments, LLC, et al.*, Case No. 473396V. The debtors did not make any payments from September 12, 2019 to November 16, 2020 and owed Small Business Financial Solutions, LLC \$72,214.72. The parties have since been able to begin negotiating a settlement, but Defendant's actions resulted in a Judgment against the debtors and prevented Small Business Financial Solutions, LLC from receiving its payments for approximately one year, and debtors still owe Small Business Financial Solutions, LLC \$61,655.33.
- D. The debtors stopped making payments after August 12, 2019, and upon filing suit in Circuit Court for Montgomery County, Maryland, Small Business Financial Solutions, LLC became aware that CCS was involved with the debtors, and after the attorney hired by CCS to represent the Debtor failed to engage in litigation, sanctions were entered in the form of a Judgment against the debtors His Handiworks, LLC, Mark Lorang, and Lorraine Olson on September 15, 2020. *See Small Business Financial Solutions, LLC v.*

His Handiworks, LLC, et al., 473739V. The debtors have not made any payments since August 12, 2019 and currently owe Small Business Financial Solutions, LLC \$98,827.65.

E. The debtors stopped making payments after November 22, 2019, and upon filing suit in Circuit Court for Montgomery County, Maryland, Small Business Financial Solutions, LLC became aware that CCS was involved with the debtors, and after the attorney hired by CCS to represent the Debtor failed to engage in litigation, sanctions were entered in the form of a Judgment against the debtors New Method, LLC and Bruce Rogat on September 16, 2020. *See Small Business Financial Solutions, LLC v. New Method, LLC, et al.*, 477518V. The debtors did not make any payments from November 22, 2019 to October 19, 2020 and owed Small Business Financial Solutions, LLC \$47,236.47. The parties have since been able to begin negotiating a settlement, but Defendant's actions resulted in a Judgment against the debtors and prevented Small Business Financial Solutions, LLC from receiving its payments for approximately one year, and debtors still owe Small Business Financial Solutions, LLC \$41,236.47.

I solemnly affirm under the penalty of perjury and upon personal knowledge that the foregoing facts are true and correct.



Patrick Siegfried
Deputy General Counsel
Small Business Financial Solutions, LLC
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